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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TANYA MAYHEW, TANVEER ALIBHAI,
and TARA FESTA, *individually on behalf of
themselves and all others similarly situated,*

Plaintiffs,

v.

KAS DIRECT, LLC and S.C. JOHNSON &
SON, INC.,

Defendants.

Case No.: 16-cv-6981 (VLB)

**PLAINTIFFS' RENEWED MOTION FOR
PRELIMINARY APPROVAL OF
SETTLEMENT, APPROVAL OF FORM
NOTICE, AND SCHEDULING OF FINAL
APPROVAL HEARING**

Plaintiffs Tanya Mayhew, Tanveer Alibhai, and Tara Festa (“Plaintiffs”) respectfully move this Court for an Order preliminarily approving the amended proposed class action settlement (“Settlement”), approving the form notice, and scheduling the final approval hearing as set forth in the First Amended Joint Stipulation of Settlement (“Amended Settlement Agreement”) attached as Exhibit 1 to the Declaration of Melissa S. Weiner (“Weiner Declaration”). Specifically, the Parties ask that the Court enter the proposed Order, thereby:

- (1) granting Preliminary Approval of the Amended Settlement Agreement;
- (2) approving the proposed Notice program;
- (3) directing Notice to Settlement Class Members;
- (4) enjoining the prosecution of other litigation on behalf of Settlement Class Members asserting any of the Released Claims; and
- (5) scheduling a Final Approval Hearing.

In addition, Plaintiffs also request that the Court conditionally certify the proposed Class for the purposes of Settlement.

In support of this Renewed Motion, Plaintiffs rely on the attached Memorandum of Law, as well as the Declarations of Melissa S. Weiner, Jason Sultzzer, and Katherine Van Dyck and their supporting exhibits, all documents filed therewith, and the arguments of counsel.

Respectfully submitted on this 21st day of November, 2017.

Dated: November 21, 2017

CUNEO GILBERT & LADUCA, LLP

By: s/ Charles J. LaDuca
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